

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO
DRAFT

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al

Debtors (1)

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly administered)

OMNIBUS RESPONSE TO THREE HUNDRED SEVENTY FOURTH OMNIBUS
OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO ...AND
PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO LATE FILED CLAIMS (CLAIMS
174661, 174604, AND 174660) ¹

TO THE HONORABLE COURT:

Come now, the parties identified below, through the undersigned attorney who respectfully
state, pray, and request as follows:

I. THE PARTIES:

The appearing parties correspond to the following:

a) Unión de Empleados de Oficina de la Autoridad de Edificios Públicos also known as
Unión de Empleados de Oficina y Profesionales de la Autoridad de Edificios Públicos, hereinafter
UEOPAEP; and

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

b) Unión de Empleados de Autoridad de Edificios Públicos.

II The claims

The claims correspond to the following as set forth in the table submitted with the Omnibus Objection:

1) Unión de Empleados de la AEP on behalf of Bargaining Unit Employees (July 29, 2020)
Claim 174661 (\$25,000.00) Claim filed after deadline set forth in Bar Date Orders

2) Unión de Empleados de la AEP on behalf of George Pagán Negrón Claim 174604
(August 28, 2020) (\$203,608.00) Claim, filed after deadline set forth in Bar Date Orders

3) Unión de Empleados de Oficina de AEP on behalf of Bargaining Unit Employees (July 29, 2020 Claim 174660 (\$20,000.00) Claim, filed after deadline set forth in Bar Date Orders

III. Bar date

The bar date set forth by the Court corresponds to July 29, 2020.

IV. The claims were filed on or before the deadline

An examination of the table attached to the Omnibus Objection referred to above as far as claims number 927 and 929 as numbered in the list, clearly show that they were filed on July 29, 2020. See also statement under penalty of perjury attached as exhibit 1 in that respect and the copies of those two claims, and specifically claims 17461 and 174600 (Exhibits 2 and 3), which have the receipt stamp of PRIME CLERK LLC dated July 29, 2020.

As far as claim 928 as numbered in the list referred to above and as claim number 174604, the claim attached as exhibit 4, and the statement under penalty of perjury attached as exhibit 1. the proof of claim clearly shows the date of July 28, 2020 as the date in which PRIME CLERK LLC received the proof of claim. It is also requested from the Court to take notice of the statement attached, that corresponds to a statement of the person who personally went to the office of PRIME CLERK LLC, one of the offices with authority to receive the claims, in which she explains how she

delivered personally the claims referred to herein.

WHEREFORE it is respectfully requested from the Court to take notice of this response for all pertinente legal purposes and to proceed to deny the objections regarding the claims referred to herein.

In San Juan, Puerto Rico this 20th day of September 2021.

We hereby certify that on this same date a true and exact copy of this motion has been submitted to the parties of record on this matter just as those who have an attorney on this matter through the electronic case management system and of the Court.

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